

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
Southern Division**

D. G. Sweigert, Pro Se Plaintiff	
-against-	CASE:
MULTIMEDIA SYSTEM DESIGN, INC. d/b/a CROWDSOURCE THE TRUTH A New York Corporation	Case: 4:22-cv-12696 Assigned To : Kumar, Shalina D. Referral Judge: Patti, Anthony P. Assign. Date : 11/8/2022 Description: CMP SWEIGERT V. MULTIMEDIA SYSTEM DESGIN, INC ET AL
ODYSEE HOLDINGS, INC. A Delaware Corporation	
LBRY, INC. A Delaware Corporation	
Defendant	

Plaintiff Pro Se

D. G. SWEIGERT, C/O
MAILBOX, PMB 13339
514 Americas Way, Box
Elder, SD 57719
Spoliation-notice@mailbox.org

Defendant

**MULTIMEDIA SYSTEM DESIGN,
INC. d/b/a CROWDSOURCE THE
TRUTH**
New York, New York 10001
truth@crowdsourcethetruth.org

Defendant

ODYSEE HOLDINGS, INC.
A New Hampshire Corporation

Defendant

LBRY, INC.
A New Hampshire Corporation

COMPLAINT

Signed this seventh day of November (11/7/2022).



**D. G. SWEIGERT, C/O MAILBOX,
PMB 13339, 514 Americas Way, Box Elder, SD 57719**

COMPLAINT

NOW COMES THE PRO SE PLAINTIFF D. G. SWEIGERT to provide this Honorable Court with a complaint for damages in excess of \$75,001.00.

INTRODUCTION

This Honorable Court has been fully briefed on the matters related to JASON GOODMAN and his former room-mate GEORGE WEBB SWEIGERT. See 2:22-cv-10002-GAD-KGA *Sweigert v. Goodman*, ORDER 22-cv-10002 (E.D. Mich. Apr. 1, 2022)

PARTIES

DEFENDANT ODYSEE HOLDINGS, INC. of Manchester, New Hampshire (Delaware Corporation 6098950, service via registered agent HARVARD BUSINESS SERVICES, INC., 16192 COASTAL HWY., LEWES, DELAWARE, 19958), and,

DEFENDANT LBRY, INC., of New Hampshire (Delaware Corporation 5736013, service via registered agent INCORP SERVICES, INC. 919 NORTH MARKET STREET, SUITE 950, WILMINGTON, DELAWARE 19801 corporation, and

DEFENDANT MULTIMEDIA SYSTEM DESIGN, INC. a New York State corporation whose sole stockholder and employee is a man known as JASON GOODMAN (See 2:22-cv-10002-GAD-KGA *Sweigert v. Goodman*, ORDER 22-cv-10002 (E.D. Mich. Apr. 1, 2022) who does business as CrowdSource The Truth (U.S. Trademark) and 21st Century 3D, a presumed *doing business as* in New York County, N.Y. Defendant Multimedia System Design, Inc. d/b/a Crowdsourcethe Truth is a New York corporation with places of business at 505 8th Avenue,

New York, New York 10018 and 252 7th Avenue Apartment No. 6S, New York, NY 10001, and an address designated for service of process at 208 East 51st Street, Suite 200, New York, New York 10022. Current litigation: *The National Academy of Television Arts and Sciences, Inc. et al v. Multimedia System Design, Inc.*, 20-cv-07269-VEC-OTW, Southern District of New York (S.D.N.Y.). The Chief Executive Officer (C.E.O.) of M.S.D.I. is Jason Goodman. The “C.E.O.” maintains a close relationship with Q-Anon affiliates but is careful not to actually mention the word “Q-Anon”. However, in the above referenced lawsuit (*NATAS vs. MSDI*) the presiding judge Valerie E. Caproni remarked M.S.D.I. “*traffics in wild conspiracy theories*,” (id., 2021 WL 3271829, at *1 (S.D.N.Y. July 30, 2021)). Judge Caproni also admitted at an October 25, 2021 show cause hearing for Jason Goodman’s alleged contempt of court, “*this sounds like Q-Anon*”. The “C.E.O.” Defendant prefers to use coded references such as “*the 17th letter of the alphabet*” on his podcasts.

PLAINTIFF D. G. SWEIGERT. At all times described herein, the Plaintiff is a *pro se* non-attorney layman that has suffered Article III (U.S. Constitution) injuries and damages and seeks redress in the federal courts. Plaintiff has suffered the dilution of his career in the emergency medical services and the emergency management field as a direct result of the activities of the Defendant. Plaintiff is a private figure.

The Plaintiff, an Honorable Discharged U.S. Air Force veteran, is a licensed Emergency Medical Technician, a former member of the Livermore-Pleasanton Fire Department Community Emergency Response Team (LPCERT), a licensed ham radio operator, a 2018 graduate of Las Positas College (LPC) (with honors) with a degree in Network Security (attended LPC under a Veterans Educational Assistance Program), who became a Certified Ethical Hacker (U.S. Department of Defense cyber defense program (DoD 8570.01-Manual))

and is a California Emergency Management Specialist as certified by the Governor’s Office of Emergency Services (CalOES). The Plaintiff has self-published a dozen white papers on cyber security of critical infrastructure as well as the book “*Certified Ethical Hackers Field Operations Guide*”. The Plaintiff’s private plan for launching an emergency wilderness medical training academy has been severely obstructed by the Defendant.

JURISDICTION

1. This is a diversity case with at least \$75,001.00 in damages due to the Article III damages suffered at the hands of the Defendants, to include damage to professional reputation, business disparagement, intentional infliction of emotional distress and other damages. Additional jurisdiction is provided by: copyright infringement under 17 U.S.C. § 101 et seq. , 17 U.S.C. § 1201(a) & (b) (Section 1201 of the Digital Millennium Copyright Act (DCMA)), violations of Lanham Act, 11 U.S.C. § 1125(a). Section 1125(a), violations of the Federal Trade Commission Act, 15 U.S.C. § 45(a), which prohibits “unfair or deceptive acts or practices in or affecting commerce”, and Health Insurance Portability and Accountability Act of 1996 (H.I.P.A.A.) and ancillary state pendant claims such as defamation, invasion of privacy by false light, defamation *per se*, slander *per se*, libel *per se*, defamation by implication, international infliction of emotional distress (I.I.E.D.).

GENERAL ALLEGATIONS

2. LBRY, Inc. (“LBRY”) is a fairly ordinary software company. It makes web and mobile applications software primarily used for viewing videos. LBRY’s claimed difference is that it uses a blockchain to enable its video sharing and related services. The “LBRY Network”—a decentralized digital content marketplace that runs on innovative blockchain technology

developed by LBRY. A blockchain is a distributed, decentralized ledger maintained by a network of independent participants. All public blockchains rely on native cryptographic assets (“crypto assets”) to properly function. These crypto assets enable peer-to-peer transfers of value, various digital services, and payment for the cost of executing transactions. As explained below “LBC” is a type of virtual digital coin used by the LBRY network.

3. Instead of relying primarily on stock sales or venture capital to raise the money to develop and operate its business, LBRY created a digital asset called LBRY Credits (“LBC”) that it then offered and sold to get operating capital. LBRY formed “investment contracts” by the way it offered and sold LBC. Investment contracts are a type of security, and by offering and selling those securities without filing a registration statement, LBRY violated Section 5 of the Securities Act of 1933 (“Securities Act”).

4. **LBRY, Inc., the LBRY Protocol, and the LBRY Network.** In 2015, LBRY started creating and developing a blockchain protocol and associated software “to create a market for accessing and publishing information.” (“On a blockchain, each transaction is recorded in a block, which is linked to a prior block through cryptographic code ... This results in the chain of blocks making up the ledger, or blockchain ... Blockchains ... rely on the combined computing power of different networks of computers to process and verify transactions.” SEC v. Kik Interactive Inc., 492 F. Supp. 3d 169, 173 (S.D.N.Y. 2020)).

5. LBRY designed the LBRY Protocol to include a digital asset called LBRY Credits, or “LBC.” LBRY designed the LBRY Protocol so that LBC are created over time, with a planned total volume around 1 billion LBC. And LBRY designed the LBRY Protocol so that LBC can be used to make four transactions on the LBRY Network: paying to watch video content; tipping content creators; pledging LBC as a “stake” to show support for content or a creator;

and claiming a name for particular content. LBRY describes itself as a company founded to create a way to distribute and purchase digital content that would be open to the public and would not involve an intermediary. The protocol is a set of digital rules that govern the transfer of data between electronic devices. For LBRY, this is called the “LBRY Protocol.”

6. The New York company Multimedia System Design, Inc. (M.S.D.I.) controls the distribution of individual artist content developed by JASON GOODMAN of 252 7th Avenue, New York, N.Y. 10001. Defendant M.S.D.I. with Goodman at the helm maintains numerous proxy accounts on a myriad of electronic Internet servers, collectively known as the ODYSEE/LBRY CLOUD, to store process, and transmit illegal content with the encouragement that others do the same. In most cases M.S.D.I. traffics in stolen copyrighted materials that contain medical information protected by the Health Insurance Portability and Accountability Act of 1996 (H.I.P.A.A.). Said activity nullifies Section 230 immunity that might be available under the federal Communications Decency Act (CDA).

7. Further M.S.D.I. acting jointly with the sole owner and employee took steps to violate 17 U.S.C. § 1201(a)&(b) and obtain copyright protected works which were illegally placed into the ODYSEE/LBRY CLOUD (blockchain). To this end M.S.D.I. has violated Section 1201 of the Digital Millennium Copyright Act (DCMA) by defeating copyright safeguards and placing said content into the LBRY blockchain.

8. It is common practice for M.S.D.I., at the direction of its only officer, only stockholder and owner Jason Goodman, to create various proxy accounts on the ODYSEE interface. M.S.D.I. uses these fake proxy accounts to infest the LBRY, INC. network with illegal content that can never be removed from the block-chain.

9. When Plaintiff discovered several of his stolen videos are available for broadcast on the LBRY/ODYSEE CLOUD, the Plaintiff contacted “ODYSEE, INC.” (as displayed on their copyright notice page) and promptly sent several copyright violations notices to ODYSEE pursuant to 17 U.S.C. § 512(c) of the Digital Millennium Copyright Act (the “DMCA Takedown Notice”). These notices were eventually sent to cooperates officers to include JULIAN CHANDRA.

10. In an arbitrary and capricious manner, the HELLO@ODYSEE.COM DCMA help desk provided the Plaintiff with misleading and incorrect information on several occasions. The story of what an acceptable DCMA take down would constitute changed several times. ODYSEE had changed several times during the course of a dozen e-mail message exchanged. Finally, ODYSEE referred the Plaintiff to the web-site of a law office in Cleveland, Ohio. The Plaintiff confirmed that the law office had nothing to do with ODYSEE.

11. It became clear that ODYSEE had been “caught with their pants down” as there is no technical mechanism within the blockchain technology to delete or “take down” a DCMA violation. In other words, ODYSEE was forced to provide falsehoods to the public to “explain away” their inability to comply with a DCMA take-down request.

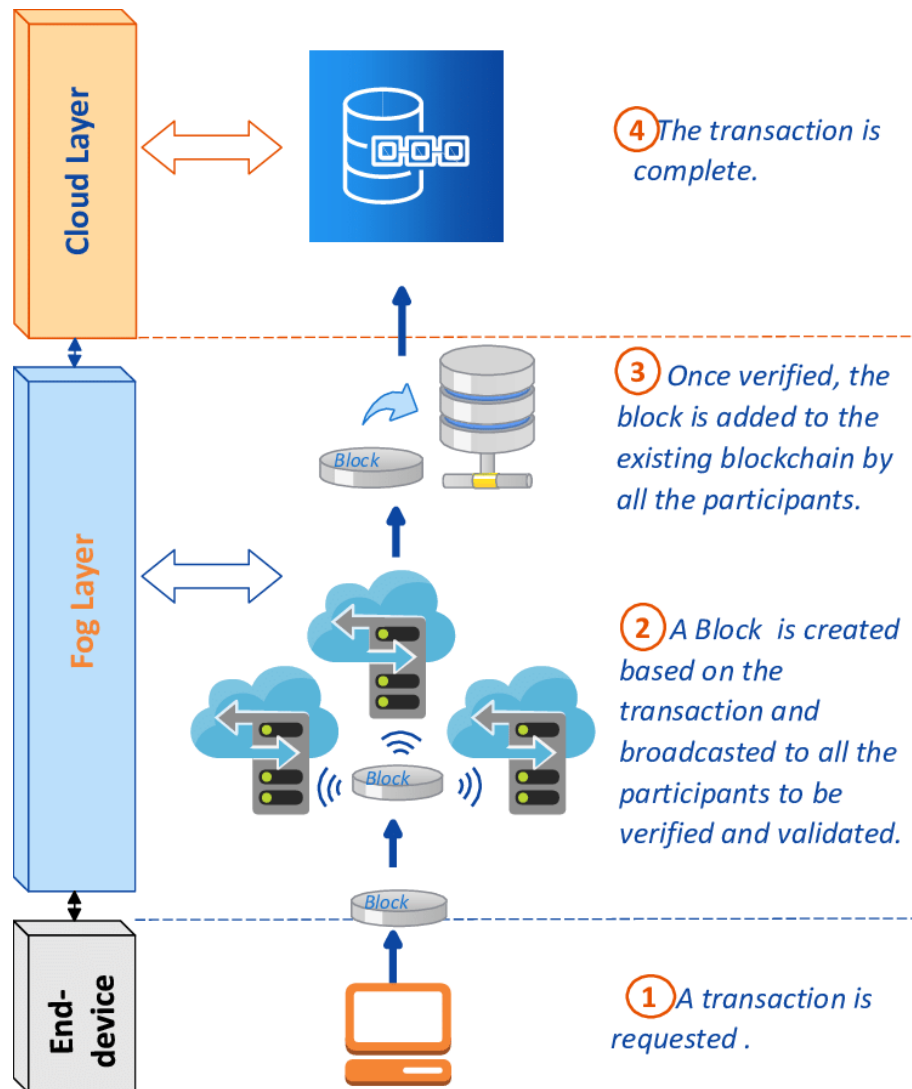
12. It does not appear that LBRY, INC. or ODYSEE HOLDINGS, INC. have the necessary safety tools to delete such content. In fact, there are instances where ODYSEE has openly misrepresented this fact to the public and claimed that they could comply with DCMA take down notice (a misrepresentation). On reason and belief, the LBRY blockchain servers are technical instruments to defeat copyright protections in violation of 17 U.S.C. § 1201 of the DCMA.

13. The ODYSEE/LBRY CLOUD is compromised of block-chain servers that form a chain like bound interlinking all media content, this is the corner stone theory that drive electronic currencies. It is the block chain linkage that forces a limitation on the media content to prevent replication and copying without any upper limit.

14. For the purposes of block-chain electrotonic currency this approach may be satisfactory, but a new problem is created. Once copyrighted electronic files are placed into the *block-chain Cloud* those electronic files **can not be deleted.** This is problematic for files that represent illegal content. For instance, electronic files that have content describing denials of the German holocaust are considered illegal contraband in Canada and Germany. Criminal offenses are associated with the storage, transmission and possession of such files in those countries.

15. The same can be said for files of Child Sexual Abuse (CSAM) material, illegally procured copyrighted materials, and other such files that infest the ODYSEE/LBRY CLOUD via the block-chain non-deletion technology.

16. When a server provider, or content service provider, steps outside the role of pure electronic publisher then no immunity under Section 230 of the CDA is available. This happens when the service provider has undertaken the conscious decisions that fall outside mere body-politick bulletin board exchanges in the town square. When a *service provider* establishes the town square bulletin board, and nothing more, Section 230 attaches to the content – as no actions are undertaken by the publisher). However, this is not the case with the active involvement of the LBRY/ODYSEE block-chain, which among other things creates a time-stamp and forced linkage to other materials (see below).



https://www.researchgate.net/figure/Blockchain-for-Fog-and-IIoT_fig3_341668329

17. As noted in *Securities and Exchange Commission v. LBRY, Inc.*, Civil Action No. 1:21-cv-00260 (D.N.H. filed March 29, 2021) LBRY, INC. has issued what the U.S. Government considers unlicensed securities or tokens, similar to “BitCoins”. As notes in the Government’s press release:

“According to the SEC’s complaint, from at least July 2016 to February 2021, LBRY, which offers a video sharing application, sold digital asset securities called “LBRY

Credits" to numerous investors, including investors based in the US. The complaint alleges that LBRY did not file a registration statement for the offering, and that the offering failed to satisfy any exemption from registration. The complaint further alleges that by failing to file a registration statement, LBRY denied prospective investors the information required for such an offering to the public. As alleged, LBRY received more than \$11 million in U.S. dollars, Bitcoin, and services from purchasers who participated in its offering.

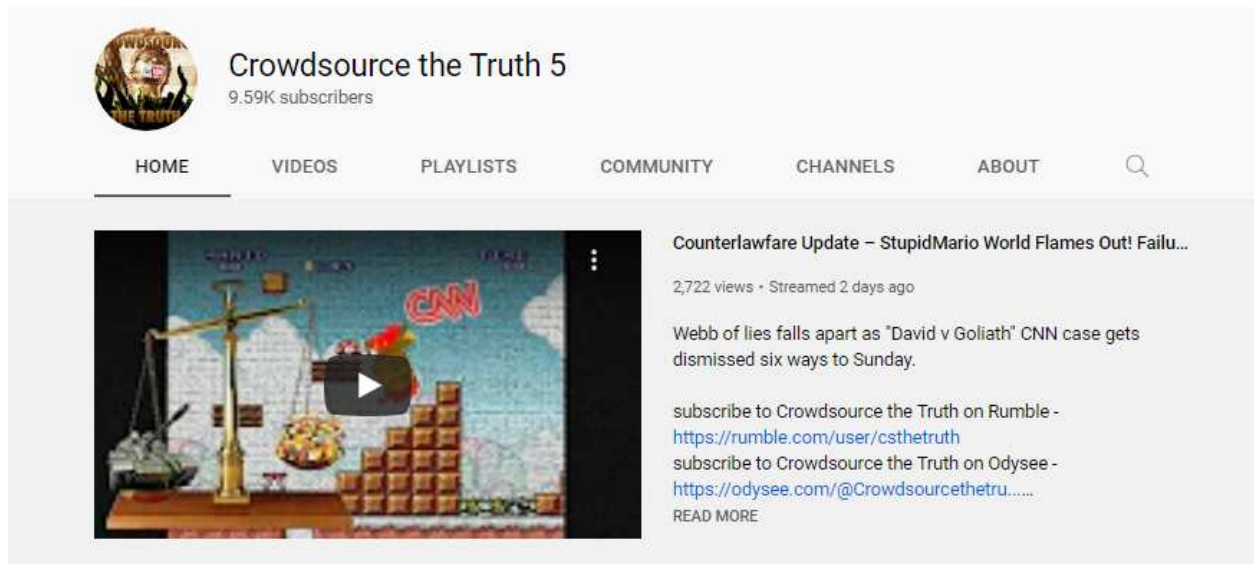
<https://www.sec.gov/litigation/litreleases/2021/lr25060.htm>

18. THE LBRY, INC. block-chain servers act as the chassis of the Cloud, with ODYSEEY HOLDINGS, INC. providing the comfortable user interfaces, such as the preverbal steering wheel. ODYSEE is the chair in the theatre that allows a patron to watch the movie projected by the mechanics of the LBRY, INC. projector. Both are inextricably intertwined to one another. Both violate the provisions of the DCMA.

19. Pursuant to 17 U.S.C. § 512(g) of the DMCA, a Service Provider (e.g., LBRY/ODYSEE) that should remove content pursuant to a DMCA takedown notice but may replace that content within 10 to 14 days after receiving a **counter notification** from the poster (M.D.S.I.) in order to retain its protection from copyright infringement liability as provided for by the DMCA, unless a lawsuit is filed.

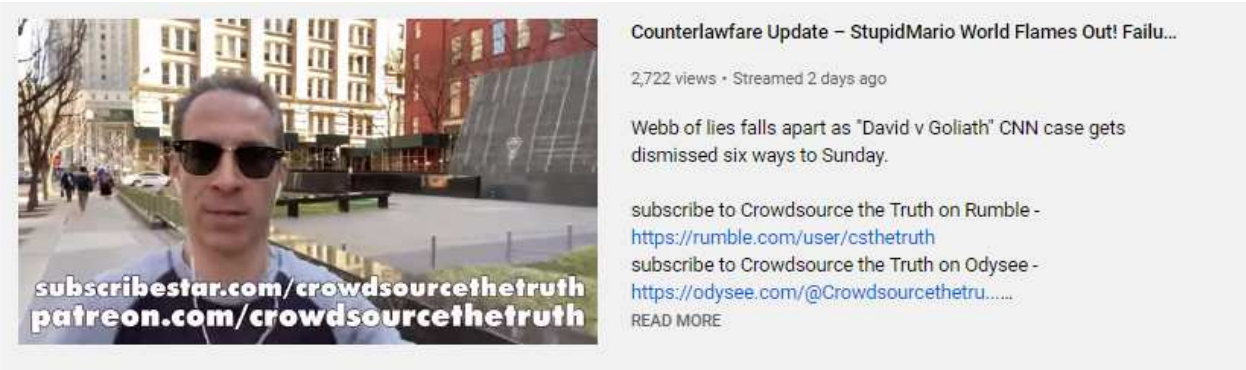
20. The CrowdSource The Truth brand is promoted as a “fact checking service” on a public social media video distribution network that consists of at least 13 public social media properties (YouTube, Facebook, Bit-Chute, Twitter, etc.) and two (2) private video servers PATREON and SUBSCRIBESTAR. The (1) public component (13 social media properties) accessible by the general public and serves as an advertising device, and (2) the private

component accessible on a subscriber / membership basis (such as a gentlemen's club, MATCH.COM or TINDER.COM).



<https://www.youtube.com/channel/UC2lcaABsK-5OFfYb6P9nP3Q>

21. YOUTUBE.COM, RUMBLE.COM and other publicly accessible social media sites are used by M.S.D.I. to include LBRY and ODYSSEE. Mr. Goodman, acting as the sole owner and stockholder of M.S.D.I publishes content to solicit memberships to both PATREON and SUBSCRIBESTAR Internet sites, which act as Internet servers for Defendant M.D.S.I.'s created video content podcasts available only to credit card paying "patrons", operating behind a "paywall" that can only be accessed by direct financial supporters ("patrons"). CrowdSource The Truth podcasts on PATREON/SUBSCRIBESTAR are accessible only over the interstate wires of the public Internet service. Defendant M.D.S.I. with Goodman at the helm solicits memberships and contributions from the citizens of Michigan via the interstate wires of the Internet in this manner.



<https://www.youtube.com/watch?v=qTuXPFoZERk>

[Crowdsourcethe Truth 5](#)

9.59K subscribers

SUBSCRIBE

Webb of lies falls apart as "David v Goliath" CNN case gets dismissed six ways to Sunday.

subscribe to Crowdsourcethe Truth on Rumble - <https://rumble.com/user/csthetruth>

subscribe to Crowdsourcethe Truth on Odysee - <https://odysee.com/@Crowdsourcethetruth...>

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Visit <http://www.crowdsourcethetruth.com>

<https://www.youtube.com/watch?v=qTuXPFoZERk>

22. To attract members of the general public to become subscribers and members to view privatized video podcasts on PATREON/SUBSCRIBESTAR, PART ONE of a podcast is distributed on an open platform (YouTube, BitChute, Rumble, Twitter, Facebook, etc.), PART TWO on a closed platform (PATREON/SUBSCRIBESTAR).

23. The information provided in both public and private podcasts include allegations of criminal conduct about the Plaintiff which are materially false. Commencing in July 2021 Defendant M.S.D.I. with Goodman at the helm began publishing fact statements regarding a criminal conspiracy (defamation by implication) to reveal his discovered conspiracy to commit fraud upon this very Court by both Sweigert brothers (SUPER MARIO brothers) and the federal employee *pro se* coordinator for the Court (Richard Loury). This instant Complaint is focused on such statements that commenced a year prior to the docketing of this Complaint.

24. While operating CrowdSource The Truth platforms, Defendant M.S.D.I. has been engaging in the unfair acts and practices alleged in this Complaint which have resulted in injuries and damages to the Plaintiff in excess of \$75,001.00

25. The Plaintiff owns certain intellectual property rights, including all rights of publicity associated with the Plaintiff's education, career reputation and professional persona. The Plaintiff has published numerous white papers, articles and treatises on ethical hacking, network security, emergency management, protection of critical infrastructure, etc. To this end, prior to the Defendant's reckless attacks on his professional reputation, the Plaintiff enjoyed a professional reputation on the Internet. The Plaintiff's name, photograph and likeness have tremendous value, in particular to the industries associated with cyber security infrastructure protection aka "network security", etc.

26. The Defendant M.S.D.I. has published materially false statements concerning the professional competency and abilities of the Plaintiff who is a Certified Ethical Hacker and has published many training documents, including a training document known as the *Certified Ethical Hackers Field Operations Manual*. Such statements by the Defendant are of no legitimate interest to the public, rather they are part of an on-going smear campaign. These

unprivileged statements of Plaintiff's supposed criminal conduct have resulted in special harm to the Plaintiff's business, technical and professional reputation. Further, each and every time Mr. Goodman has a technical glitch with his podcast equipment, he is quick to implicate "that ethical hacker", known to be the Plaintiff.



https://twitter.com/JGoodman_CSTT/status/1504943754221965317?cxt=HHwWisC-1d6X0eIpAAAA

27. The Plaintiff likeness, name, image and persona (violation of right to privacy) have been used as part of a long-term false advertising campaign since at least one year ago by a so-called "fact checking service" provided by CrowdSource The Truth to lure and entice Michigan's consumers to the Defendant's "pay-wall" videos available at PATREON.

28. Defendant M.S.D.I. has acted in an extreme and outrageous manner to accuse the Plaintiff of criminal conduct under a false advertising campaign resulting in professional disparagement. This long-term false advertising campaign labels the Plaintiff as a "Deep State" actor (as if fact) that is a member of a pedophile protection network (child sex trafficking) that supports the blackmail of U.S. Government officials (cultural shorthand "QAnon"). The Defendant M.S.D.I. has, in the preceding twelve (12) months, added a new slander against the Plaintiff of criminal conduct related to the publishing of a PDF court document in the Michigan Eastern District (M.I.E.D.) lawsuit *George Webb Sweigert v. Cable News Network* (- 2:20-cv-12933-GAD-KGA).

29. The Defendant's employee Jason Goodman filed an Amicus Brief in litigation (**docket 20**, 2:20-cv-12933-GAD-KGA, *Sweigert v. CNN*) which alleged fraud upon the court perpetrated by the *pro se* coordinator of the Court, who apparently was in a conspiracy with the Plaintiff according to Mr. Goodman. Defendant then used the Amicus brief to build a narrative of a criminal conspiracy that was disseminated in a dozen video productions (defamation by implication).



https://twitter.com/JGoodman_CSTT/status/1504954872273285126?cxt=HHwWjMC9zfKe1uIpAAAA

30. In his two-page brief, titled BRIEF OF AMICUS CURIAE JASON GOODMAN IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS, Defendant Goodman explains that he "is a pro se non-attorney, non-party to this case," then Goodman declares that he "comes now as a friend of the court to share facts and evidence Goodman alleges reveal a fraud on the court intended to affect the outcome of this case." *Sweigert v. CNN*, Case 2:20-cv-12933-GAD-KGA ECF No. 20, PageID.244 Filed 07/20/21 Page 2 of 4.

31. Concurrently with the filing of the Amicus brief, the Defendant M.S.D.I. published a public podcast with his then attorney John H. Snyder, New York City, describing corruption in the M.I.E.D.; *The Counter Lawfare Report with Attorney John Snyder – Allegations of Corruption in Federal Court*, June 30, 2021.



<https://www.youtube.com/watch?v=MVzocok1fy8>

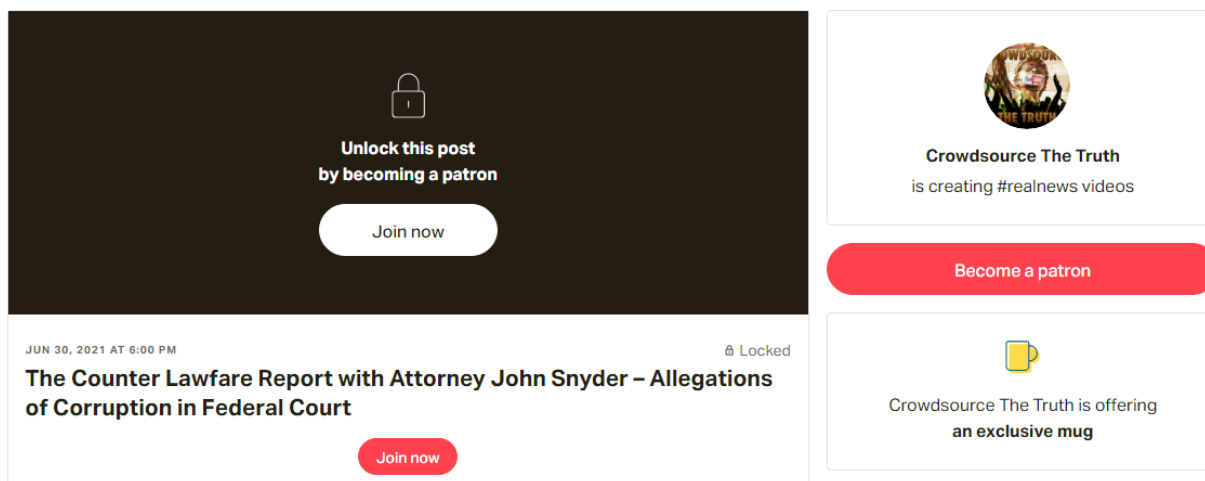
Crowdsource the Truth 5

8.95K subscribers

SUBSCRIBE

The Counter Lawfare Report returns to Crowdsource the Truth with a new legal expert. Harvard JD, tech entrepreneur and legal expert Jonathan Snyder joins me to explore allegations of corruption within the Federal Court system. This is going to be an explosive episode. Join us on SubscribeStar and Patreon.

32. Below is a representation of the privatized version of the podcast content.



<https://www.patreon.com/posts/counter-lawfare-53141470>

33. At the 10:12 time mark (from the above public video) the Defendant provides a teaser for the PATREON/SUBSCRIBESTAR privatized videos.

Jason Goodman (10:12). Before we begin our deep dive into this stunning evidence that – I want to remind our audience this isn't proof of fraud or corruption within the federal court – but were gonna show some shocking evidence that I believe is evidence of fraud and we're going to allow the audience to make their own decision. We are going to be starting in just under five minutes at subscribestar.com slash crowdsource the truth and patreon.com slash crowdsource the truth.



34. The YOUTUBE.COM video podcast described above is, in fact, an advertisement device to lure Michigan consumers to the privatized videos on PATREON/SUBSCRIBESTAR.

The public video (see above) is a tease and lure which implies criminal activity will be examined.

35. This lure and tease tactic is common amongst QAnon-based conspiracy theorists, such as Defendant Goodman (whom a federal judge has ruled “*traffics in wild conspiracy theories*”). The term “QAnon-based conspiracy theories” is, in the Plaintiff’s view, the most succinct way of contextualizing CrowdSource The Truth and the baseless “investigations” that promote materially false statements.

36. Jason Goodman, and or his company (M.S.D.I.), is presently involved in three (3) separate federal lawsuits in the Southern District of New York (S.D.N.Y.). The Plaintiff was the Plaintiff in the action *D. George Sweigert vs. Jason Goodman*, S.D.N.Y., 18-cv-08653 (VEC) (SDA). Plaintiff withdrew the action on March 1, 2022 after four (4) years of litigation. In that action the Defendant explains his behavior:

*“Defendant Goodman filed an Amicus Curiae brief in Sweigert v CNN in which **he alleges and presents evidence that Sweigert and Webb perpetrated a fraud on the court, conspiring with or otherwise forging information pertaining to Richard Louri (“Louri”) an employee of the District Court in Eastern District of Michigan. See 20-cv-12933-GAD-KGA ECF No. 12 (EXHIBIT G)**” [emphasis added] See S.D.N.Y., *Sweigert vs. Goodman*, Case 1:18-cv-08653-VEC-SDA Document 305 Filed 08/12/21 Page 6 of 47.*

37. On December 30, 2021 the Defendant M.S.D.I. published a public video podcast, entitled, *Ghost Town NYC – Hollywood Distorter's False Statements of Fact Favor EMMY Liars & Goodbye de Blasio*, (https://www.youtube.com/watch?v=90_Jtqt-JtE) , where he stated on camera:

Jason Goodman (1:10:52) “If it wasn’t for that pesky amicus brief, because you see, that presented evidence that supports the allegation that a forged document was placed

*on the docket, and it raises certain questions about who might have done that. And I have a feeling, I don't know, and we won't know until the hearing happens, but I have a feeling, **Judge Drain called that hearing because he wants to hear details about the evidence that I presented.***" [emphasis added]

"And the court does have the inherent power to conduct an investigation in the case that someone's trying to deceive them. Fraud on the court is within their power to investigate and punish people; for they got marshals there, they can arrest people, stick them in jail, and stuff, so we'll see what happens."



https://www.youtube.com/watch?v=90_Jtqt-JtE

38. The three (3) S.D.N.Y. lawsuits involving Jason Goodman in some way have produced evidence that indicates CrowdSource The Truth is not a fact checking service (see “*Crowdsorce The Truth is an Open Source Fact Checking "Truth Engine"* “ <https://www.patreon.com/crowdsourcethetruth>) but an alleged commercial for-profit behavioral enhancer and reinforcer of anti-Government conspiracy theories with close ties to key social media influencers of the so-called Q-Anon alt-right conspiracy theory movement with similar commercial interests (to include TRUMP promoter Felix Sater, Lt. Gen. Michael J. Flynn, U.S.A., ret. and his personal attorney Sidney Powell (see sanctions statements against Ms.

Powell made by District Judge Linda V. Parker, *Timothy King v. Gretchen Whitmer*, Civil Case No. 20-13134)). Widespread reporting by Defendant about Sidney Powell and General Flynn also demonstrates an affinity to Q-Anon based and hoax election conspiracy theories. Pictured below is the Defendant with General Flynn's attorney, Sidney Powell.



39. Ms. Powell's meeting with Mr. Goodman took place in Dallas, Texas at an event known as "The Patriots Roundtable at Operation Classified", November 2018, which is promoted on Ms. Powell's website (see below).



<https://www.sidneypowell.com/media/media/patriots-roundtable-at-operation-classified>

40. Below is a screen shot of the video podcast Mr. Goodman distributed from Operation Classified, Dallas, Texas.



41. A mainstream article chronicles Operation Classified.



The three-day conference in November 2018 was called “Operation Classified” and promised attendees they would “come away with a comprehensive understanding of the Deep State.” Featured speakers, gathered at a Hilton hotel in a Dallas suburb, included militia leaders, anti-vaxxers, a UFO activist, as well as a former federal prosecutor named Sidney Powell, who delivered a somber, noteless recitation in a folksy Southern accent.

Powell was there as a leading proponent, on cable news and in op-eds, of a conspiratorial narrative advanced by the far right: that special counsel Robert Mueller’s Russia investigation was part of a plot by the intelligence community to force President Donald Trump from office. Her talk was titled “Creeps on a Mission to Destroy the President,” a phrase she had coined on “Hannity” and then turned into a pro-Trump, T-shirt-selling website to denounce Mueller and his team of investigators. “This goes so deep and so wide, it is unbelievable,” Powell said with a heavy sigh during her 40-minute speech.

<https://www.politico.com/news/magazine/2020/01/17/maga-lawyer-behind-michael-flynn-legal-strategy-098712>



<https://www.operationclassified.com/Events/PressReleaseDetails?Id=1>

42. Defendant M.S.D.I. has been an active and vocal proponent of “stolen election” conspiracy theories and has promoted Sidney Powell/General Flynn on his social media platforms. Defendant M.S.D.I. widely promoted General Flynn’s “oath to Q-Anon” in July 2020 and has published countless videos of General Flynn supporters such as retired Federal Bureau of Investigation (F.B.I.) agent Robyn Gritz, former aide to General Flynn.

43. The stated business model (as proclaimed on the PATREON credit card service <https://www.patreon.com/crowdsourcethetruth>) of CrowdSource The Truth orbits around the so-called collection and vetting of private facts that are published about individuals to a worldwide Internet audience for commercial gain via PATREON/SUBSCRIBESTAR “credit card merchant account” transactions. This also includes the practice of sham legal litigation filings (such as his Amicus brief in *Sweigert v. CNN*) by Defendant Goodman to support fund

raising for the COUNTER LAWFARE FUND (which solicits donations, tributes, and funds from the general public for “legal advocacy”).

44. Widely published claims are made by the Defendant that CrowdSource The Truth conducts “investigations” as a “fact checking service” which in fact is a fraudulent claim made with the intent to defraud the consumer public of Michigan by directing financial contributions, tributes, donations and other pecuniary benefits to the Defendant.

45. Claims presented to the public via social media by the Defendant assert that his “investigations” are conducted as a COUNTER LAWFARE initiative to protect the Defendant from “Deep State” operatives using the legal system to quench his “journalist endeavors”. COUNTER LAWFARE is another hoax and scam that is published with the intent to defraud the public in reckless disregard of the truth for deceptive purposes (see “*Crowdsourcing The Truth is an Open Source Fact Checking "Truth Engine"*” at <https://www.patreon.com/crowdsourcethetruth>).

46. The intentional and fraudulent misrepresentations by Defendant M.S.D.I. with Goodman at the helm include “investigations” into the background of individuals, like U.S. District Court for the Eastern District of Michigan (M.I.E.D.) staffer Richard Loury, to “expose” “Deep State” affiliations, and that such private “facts” are then vetted by the “crowd” for substantiation.

47. CrowdSource The Truth has been embedded within the Q-Anon social media culture ever since June 14, 2017 when direct actions by the Defendant Goodman and Plaintiff George Webb Sweigert (“GEORGE WEBB”) forced the closure of the Port of Charleston, South Carolina due to an Internet hoax created by the “C.E.O.” and “GEORGE WEBB” (Plaintiff).

48. The “Port of Charleston dirty bomb hoax” was widely reported in the mainstream press in the days following June 14, 2017. This includes the New York Times (

<https://www.nytimes.com/2017/06/15/us/port-dirty-bomb-south-carolina.html>), Cable News Network (<https://money.cnn.com/2017/06/16/media/port-of-charleston-dirty-bomb-conspiracy-theory-shutdown/index.html>), TIME Magazine (<https://time.com/4820968/port-of-charleston-bomb-threat-conspiracy-theorist/>), REUTERS (<https://www.reuters.com/article/us-south-carolina-terminal-threat/fbi-opens-probe-of-false-dirty-bomb-threat-at-south-carolina-port-idUSKBN1960DN>), television stations (<https://abcnews4.com/news/local/wando-welch-port-terminal-evacuated-for-threat>), New York Post (<https://nypost.com/2017/06/15/coast-guard-investigating-dirty-bomb-threat-claim-at-charleston-port/>), to name a few.

49. More recently, a film documentary has tied “behind the scenes” personages related to Defendant Goodman and Plaintiff GEORGE WEBB to the Port of Charleston incident. These personages were heavily involved in the creation of a Delaware corporation known as “ShadowBox Strategies” which openly commercialized reputational destruction tactics via social media smear campaigns designed to mimic the Israeli-influenced intelligence group known as “Black Box”.

50. These activities have been widely documented and reported in the VICE NEWS documentary. In a pre-release announcement of the VICE NEWS documentary, published 01/13/2021, entitled, “*Where Did QAnon Come From?*”, it states (in relevant part): “The series delves into the murky online world where Q emerged and speaks with key QAnon figures, including Manuel Chavez III, who claims to have come up with the idea for Q as part of a LARP (live-action role-playing game); and former CIA officer Robert David Steele, who’s become a revered figure in QAnon circles.” (<https://www.vice.com/en/article/dy8ww7/where-did-qanon-come-from>) See also (https://www.vicetv.com/en_us/video/who-is-

[q/6000c15fbf6a2852a3354834](#)) and Financial Times article ([Is QAnon a game gone wrong? | FT Film | Financial Times](#)).

51. Manuel Chavez, III played a key role in an “investigation” of the so-called Seth Rich murder files commenced by both GEORGE WEBB and Defendant Goodman in the weeks prior to the Port of Charleston dirty bomb hoax. In May of 2019 Defendant Goodman collaborated with Manuel Chavez, III in the release of two hundred (200) e-mail messages related to the “ShadowBox” reputation destruction service.

52. Immediately prior to the Port of Charleston incident, GEORGE WEBB appeared with Robert David Steele on a live video podcast produced and managed by Defendant Goodman for the purposes of raising \$38,000 to fight the “Deep State”.

53. For at least the previous three (3) years the “C.E.O.”, sole stockholder and owner of M.D.S.I. the Defendant, acting in his personal and business capacities, has been using the operation of CrowdSource The Truth to destroy the technical, industry-based, business reputation of the Plaintiff with an all-encompassing public relations destruction campaign carried out on over thirteen (13) social media outlets to link the Plaintiff with this “Port of Charleston dirty bomb hoax”. These statements regarding cooperation, associations, communications between the Plaintiff and GEORGE WEBB by Defendant Goodman are known to be false and are published in reckless disregard by the Defendant for the purposes of injuring the Plaintiff.

54. The VICE NEWS documentary accurately insinuates that multiple “behind the scenes” personages contributed to the “Port of Charleston” incident as a catalyzing event to prepare the inauguration of the QAnon conspiracy. The principal personages involved have been associated with large financial contributors to DONALD TRUMP related public relations initiatives.

Professional public relations consultants orbit this constellation of actors; to include life-long friend of the Defendant Goodman Brad Parscale, chief social media campaign strategist for the TRUMP CAMPAIGN, Roger Stone, former TRUMP adviser, “Doctor” Jerome Corsi, PhD author of QAnon related books, see *Killing the Deep State The Fight to Save President Trump*, Corsi, Jerome R.), former FOX NEWS correspondent Edward Butowsky, and other “digital soldiers” to include Manuel Chavez, III (Carson City, Nevada) and Thomas Schoenberger (Provo, Utah). Seen below is Defendant Goodman with Roger Stone.



55. For the previous three (3) years the “C.E.O.” and sole owner of M.D.S.I., has used the business resources of these his companies, using the CrowdSource The Truth trademark, to link the Plaintiff with the underground of “behind the scenes” players responsible for the Port of Charleston closure (for a radiological device detection sweep with incident involvement from over 200 public safety responders). This includes the widespread publishing of artwork, podcasts, and other media to implicate the Plaintiff as a “Deep State Duncie” working in harmony with Mr. Chavez and Mr. Steele. All of the “working in concert” allegations raised by the “C.E.O” Defendant against the Plaintiff are completely false but were willfully published by the “C.E.O.” via CrowdSource The Truth media properties with knowledge of their falsity. A year’s long false advertising campaign capitalized on these falsifications across a widespread

social media network to ensure maximum audience penetration. The CrowdSource The Truth social media footprint is listed below:

- YouTube.com channel entitled “Jason Goodman”.
<https://www.youtube.com/channel/UC8Cl9QaRtuW9CNjP7pP4BBQ>
- YouTube.com channel entitled “Crowdsourcethe Truth 2”.
https://www.youtube.com/channel/UC6e48gru_N9w-tyqMCRi9Qw
- YouTube.com channel entitled “21c3D” [21st Century 3D]
<https://www.youtube.com/user/21c3D>
- Twitter.com channel entitled “csthetruth”
<https://twitter.com/csthetruth>
- Patreon.com channel entitled “crowdsourcethetruth”
<https://www.patreon.com/crowdsourcethetruth>
- Facebook.com channel entitled “Crowdsourcethe Truth”. [Public Group]
<https://www.facebook.com/groups/crowdsourcethetruth/>
- Facebook.com channel entitled “Crowdsourcethe-Truth”
<https://www.facebook.com/Crowdsourcethe-Truth-1331354320209243/>
- Instagram.com channel entitled “crowdsourcethetruth”
<https://www.instagram.com/crowdsourcethetruth/>
- Redbubble.com channel entitled “crowdsourcethe-truth”
<https://www.redbubble.com/shop/crowdsourcethe+truth>
- Subscribestar.com channel entitled “crowdsourcethetruth”
<https://www.subscribestar.com/crowdsourcethetruth>
- Twitch.tv channel entitled “crowdsourcethetruth”
<https://www.twitch.tv/videos/170314609>

SPECIFIC ALLEGATIONS

56. CrowdSource The Truth (under the control of Defendant M.S.D.I. with Goodman at the helm) smears human targets for reputation destruction under the guise of conducting hoax

“investigations”, like the accusations of a criminal corruption conspiracy within the M.I.E.D. The “C.E.O.” and sole owner of M.D.S.I., the Defendant, acting in his personal and business capacities, utilizes CrowdSource The Truth as a “QAnon-based” public relations narrative delivery system. Collective behavior of “patrons” or the “crowd” is directed by the “C.E.O.” to facilitate cyber mob attacks on individuals (like the Plaintiff), or the *pro se* coordinator for M.I.E.D. Richard Loury.

57. Defendant M.S.D.I. has alleged in numerous podcasts to the public that Richard Loury (employee of M.I.E.D.), the Plaintiff and his brother “GEORGE WEBB” have participated in some sort of court fraud upon the court and face “criminal charges” (false light), see January 29, 2022, Crowdsorce the Truth livestream titled, Ghost Town NYC-Bomb Cyclone Edition Blizzard '22. As Defendant Goodman stated in the video:

Jason Goodman: (51:52) It's amazing the number of people who are in the professional harassment business. It's so bad the Super Mario brothers (a reference to the Sweigert brothers), I can't believe I haven't spoken about them. There's been a lot of stuff going on with them. They seem to be concerned about Detroit. Did people catch my discussion about traveling to Detroit? It was a big pain in the ass. The hearing got cancelled...hearing got cancelled and I think I, I think I know why, I don't want to say too much about it because these are ongoing things, but Super Mario brothers should be very concerned about Detroit.”

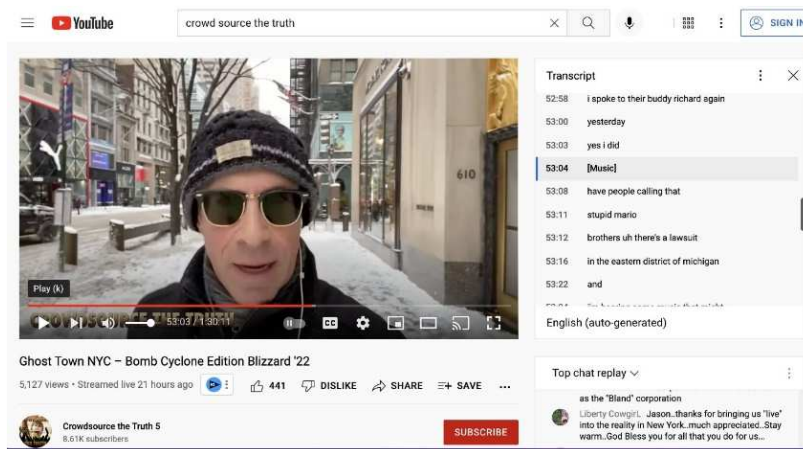
(52:58) “I spoke to their buddy Richard again yesterday. Yes I did...have people calling that stupid Mario brothers. Uh there's a lawsuit in the Eastern District of Michigan, but there was another filing in the suit yesterday and Richard Loury (of the Michigan Eastern District court staff) left his name on it. This guy's not too smart and they're going to be in a lot of trouble. I don't think they fully appreciate what's going on.”

(54:46) “If anybody had any questions If Mr. Loury were or were not guilty, I called him up, he answered the phone. I said Richard are you all right? Your voice sounds a little

rough. And he said who's this? I said, it's Jason. He said I'm okay. I said you've been with George, what's going on with that? Click. Hung up the phone. I don't know personally, is that the way an innocent guy would act?"

(55:53) "I think when we finally get to speak with Judge Drain in the Eastern District of Michigan, it hit with a barrel."

58. The false light implication is that Richard Loury is working in a clandestine and covert manner to corrupt the processes of the Eastern District of Michigan. The video screenshots appear below (<https://www.youtube.com/watch?v=7LlPmHUz7Qs>).



59. In a Twitter tweet of Feb. 13, 2022, Jason Goodman referred to the Plaintiff as “SUPER MARIO BROTHER”. This is an example of how the Defendant uses “talk around” to continue advertisement of privatized video content where actual names of individuals are masked to the public, but revealed on PATREON/SUBSCRIBESTAR audiences.



60. On January 18, 2022 the Defendant M.S.D.I.'s sole owner traveled to Detroit, Michigan with the intent to attend a hearing in *Sweigert v. CNN*. It is believed that while in Detroit the Defendant met with a federal law enforcement special agent to provide his allegations of the criminal conspiracy (defamation by implication) involving the Sweigert brothers (aka SUPER MARIO brothers) and Richard Loury. Below is a public video podcast the Defendant made while in Detroit.



https://www.youtube.com/watch?v=SSinKt_0PZE

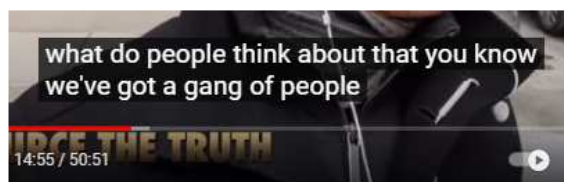
61. On Jan. 28, 2022, M.S.D.I. C.E.O. Jason Goodman, d/b/a as CrowdSource The Truth, published a Twitter tweet after hanging up the phone with Richard Loury.



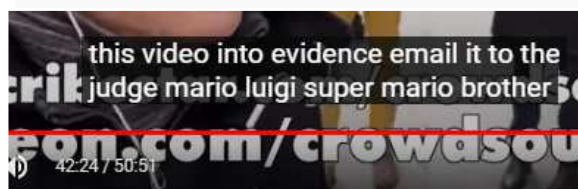
62. The above tweet makes reference to a CrowdSource The Truth social media podcast known as the “COUNTER LAWFARE REPORT”. The hoax investigations (as depicted above) are designed to promote anti-social behavior, such as cyber mob attacks, glamorization of doxing, and incitement to violence as seen with the insurrection at the U.S. Capitol on January 6, 2021.



<https://www.youtube.com/watch?v=VQAFqyoliBA>

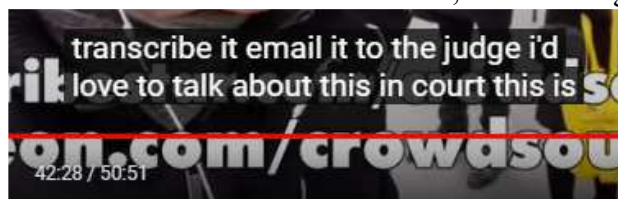


Lawfare Rages On in the Streets of New York

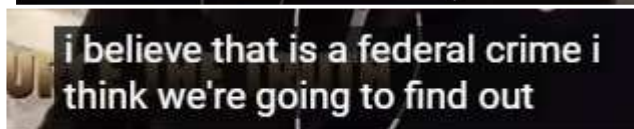
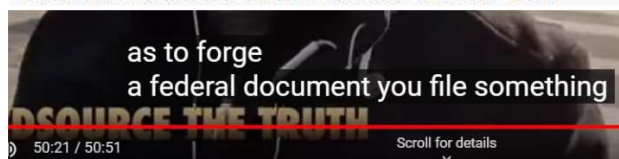


C - Lawfare Rages On in the Streets of New York

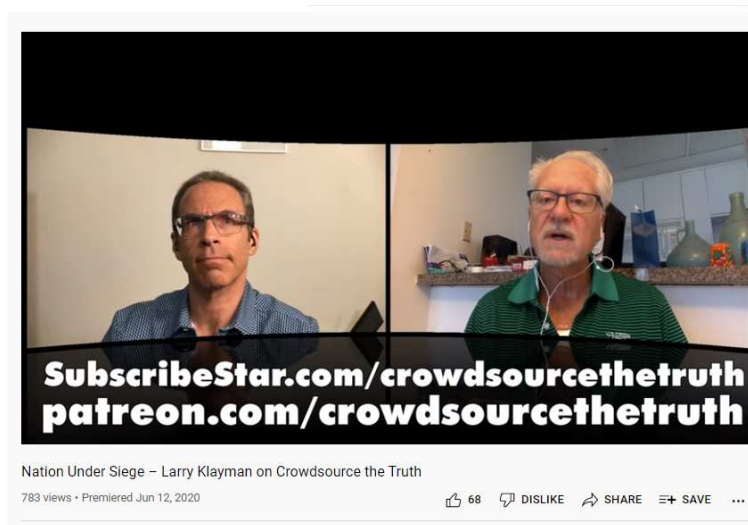
Above: Example of Mr. Goodman's references to Plaintiff, "Mario Luigi, Super Mario Brother"



- Lawfare Rages On in the Streets of New York



63. Both “GEORGE WEBB” Sweigert and Defendant Goodman are well versed in “political opposition research” (P.O.R.). These tactics (P.O.R.) have been wildly used by the Defendant’s associates like conservative talk show host and author Larry Klayman, esq. Defendant Goodman has participated in many sham P.O.R. social media podcasts directed at federal jurists in the District of Columbia, where Mr. Klayman has been suspended from the practice of law. Below Mr. Goodman is seen on the left, Mr. Klayman on the right.



<https://www.youtube.com/watch?v=Ozi2DI93s0A>

64. From a Larry Klayman issued press release (see below).

[News](#)
[Products](#)
[Contact](#)

[News in Focus](#)
[Business & Money](#)
[Science & Tech](#)
[Lifestyle & Health](#)
[Policy & Public Interest](#)
[People & Culture](#)

Freedom Watch Founder Larry Klayman Announces Criminal Indictment Of Special Counsel Robert Mueller By Citizens Grand Jury

NEWS PROVIDED BY
[Freedom Watch](#)
Jun 27, 2019, 09:00 ET

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WASHINGTON, June 27, 2019 /PRNewswire/ -- Today, Larry Klayman, a former federal prosecutor and the founder of Freedom Watch (www.freedomwatchusa.org) announced the criminal indictment of Special Counsel Robert Mueller by a citizens grand jury for the alleged crimes of witness tampering, obstruction of justice, attempting to suborn perjury and other illegalities. A copy of the indictment, jury instructions, verdict form and related documents can be found on Freedom Watch's website along with a video of the grand jury proceedings. Filming the proceedings as well as offering testimony about Mueller's alleged illegal grand jury leaks was Jason Goodman, CEO of Crowdsourcethe truth. The video of the proceedings can also be found at the links below:

Freedom Watch YouTube Channel

<https://www.youtube.com/freedomwatch>

Crowdsourcethe Truth Channel

<https://www.youtube.com/c/JasonGoodmancrowdsourcethetruth>

65. Both “GEORGE WEBB” and the Defendant were predominantly featured in social media podcasts at the U.S. Capitol insurrection on 1/6/2021. On several occasions Defendant sponsored joint podcasts with the conspiracy channel, hosted by Alex Jones, known as “INFOWARS” (caveat: a former INFOWARS reporter, Joseph Randall Biggs, was arrested on 1/20/2021 for his involvement in the 1/06/2021 Capitol insurgency [<https://www.justice.gov/opa/page/file/1357251/download>]).

66. Likewise, Mr. Jones has appeared on the Defendant M.S.D.I.’s podcast known as “[CrowdSourceThe Truth](#)” channels 2 and 3 on YouTube.COM for the purposes of peddling far-right extremism and radicalization. Mr. Jones apparently originated the term “social engineers” to describe “Deep State” traitors. (<https://tvassets.infowars.com/index/display/id/6138/page/398>). The “C.E.O.” and sole owner of M.S.D.I., the Defendant uses the term “social engineer” to describe the Plaintiff (on at least three dozen video podcasts).

67. PATREON has supposedly cleared its platform as of 10/22/2020 of Q-Anon related conspiracy theories with the following text in a PATREON announcement:

“While Patreon does not propagate this content directly, there are a small number of creators on the platform who have supported the QAnon conspiracy theory with their work. Because of this, and the fact that we have seen a number of other online platforms become overrun with pages and groups actively focused around QAnon disinformation, we are taking action. In an effort to assess and combat this growing threat, Patreon’s Policy and Trust & Safety teams have individually identified the creator accounts that have engaged in spreading QAnon-supporting disinformation.” (<https://blog.patreon.com/update-to-patreons-policies-qanon>)

FIRST CAUSE OF ACTION

Misappropriation of Right of Publicity Against Defendant M.S.D.I.

68. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 67, inclusive, as if fully restated herein.

69. The conduct of Defendant M.S.D.I., as alleged hereinabove, under the CrowdSource The Truth trademark, constitutes a knowing and unauthorized use of the Plaintiff’s name, likeness, photograph and name for commercial purposes, which have substantial commercial value. Defendant M.S.D.I. used Plaintiff’s name, photograph, and likeness knowingly and deliberately, without the prior consent of any of the Plaintiff. Plaintiff has suffered actual damages as a result of Defendant’s deliberate use of his names, photograph, and likeness on advertisements and other types of solicitations for goods or services (e.g. promotion of PATREON subscriptions). Defendant engaged in outrageous conduct, carried on with willful and conscious disregard of the rights of Plaintiff. Each such use was unequivocally and directly for purposes of advertising or selling or soliciting purchases of subscription services by Defendant M.S.D.I. / 21C3D / PATREON, such that prior consent was required.

70. As set forth more fully above, Defendant M.S.D.I.'s entire business is based around their harassment campaigns against the Plaintiff and other like situated individuals and creating content around the use of Plaintiff's name, photograph, picture, portrait and/or likeness, to solicit patronage by their fans. Defendant M.S.D.I.'s most lucrative use of Plaintiffs' name, photograph, picture, portrait and/or likeness, appears to be through Defendants' podcast, on PATREON, wherein Defendant solicits fees from their "patrons" or fans, to access their podcasts, which are principally based on using Plaintiffs' name, photographs, pictures, portraits and/or likenesses, as punching bags, and the basis of their shows, and the content therein.

71. Defendant M.S.D.I. used Plaintiff's name, photograph, picture, portrait and/or likeness in numerous ways, to advertise, solicit, and promote their business to tens of thousands of listeners, fans, and consumers; and on a variety of formats, and popular digital platforms, including, but not limited to: PATREON, Facebook, YouTube, Twitter, Periscope, Bit-Chute, SubscribeStar, and countless others.

72. In sum, this is considered "click-bait", or the use of a persona's persona to attract viewers to "click" on the podcast advertisement thumbnail (displayed in Google, LLC and YouTube, LLC search results). The Plaintiff had no relationship to these advertisements in disguise that proclaim viewers should become "patrons" via the PATREON.com and/or SubscribeStar.com "pay-walls", or metered video content that requires pre-payment via credit card by subscribers.

73. The Defendant M.S.D.I. operating at the direction of the C.E.O. Goodman, under the CrowdSource The Truth trademark, have made purely commercial video content, transmitted over the Internet wires, with the Plaintiff's likeness available on the PATREON and SubscribeStar podcast subscription credit card "pay for view" website. Such commercial

content that attempts to establish a non-existent relationship with the Plaintiff does not qualify for the newsworthy privilege exemption.

74. All of these tortious video productions are displayed for view to the general public using an Internet browser to access video podcast content via Internet networked servers that are maintained on-line by entities that operate public social media platforms in the jurisdiction of this Court (e.g. Google, LLC, YouTube, LLC, PATREON, INC, etc.).

75. The foregoing described conduct demonstrates the manner in which the Defendant has violated the privacy of the Plaintiff.

SECOND CAUSE OF ACTION

Public Disclosure of Private Facts – Against Defendant

Violations of Right to Privacy and False Light against M.S.D.I.

76. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 75, inclusive, as if fully restated herein.

77. Defendant M.S.D.I. used Plaintiff's name, photograph, picture, portrait and/or likeness, without his written consent, within the state of Michigan, for purposes of advertising or trade. Defendant M.S.D.I.'s use of Plaintiff's name, photograph, picture, portrait and/or likeness, was a use in, or as part of, an advertisement or solicitation for patronage.

78. Defendant M.S.D.I. published, over the Interstate wires, and republished Plaintiff's name, photograph and/or likeness in multiple formats, including their own promotions and advertisements, websites, social media platforms.

79. Defendant M.S.D.I.'s use of Plaintiff's name, photograph, image and/or likeness (violation of privacy and false light) – on countless occasions and in numerous formats - is clearly a recognizable likeness of the Plaintiff and is readily identifiable by someone familiar with him.

80. This tort can be described as, “One who gives publicity to a matter concerning the private life of another is subject to liability to the other for invasion of his privacy, if the matter publicized is of a kind that (a) would be highly offensive to a reasonable person, and (b) is not of legitimate concern to the public.” (Rest.2d Torts, § 652D.)

81. Plaintiff claims that Defendant M.S.D.I. violated Plaintiff’s right to privacy by his tortious conduct by the publicized private information concerning the Plaintiff, (false light) that a reasonable person in Plaintiff’s position would consider the publicity highly offensive.

82. That Defendant M.S.D.I. knew, or acted with reckless disregard of the fact, that a reasonable person in Plaintiff’s position would consider the publicity highly offensive, that the private information was not of legitimate public concern (or did not have a substantial connection to a matter of legitimate public concern).

83. That the Plaintiff was harmed, and that the Defendant M.S.D.I.’s conduct was a substantial factor in causing Plaintiff’s harm.

84. The Defendant M.S.D.I. acting in the scope of its authority, released private information about the Plaintiff that was made public by either communicating said information via social media accounts controlled by the Defendant M.S.D.I..

85. Such social media accounts to include Twitter, YouTube, PATREON, SubscribeStar, Vimeo, Banned.Video, Facebook, BitChute, Periscope, etc. These social media services were used to obtain commercial value by the morbid and sensational prying into private life of the Plaintiff for the sake of financial reward.

THIRD CAUSE OF ACTION

Intentional Infliction of Emotional Distress -- Against Defendant M.S.D.I.

86. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 85, inclusive, as if fully restated herein.

87. Plaintiff claims that Defendant’s C.E.O. conduct caused him to suffer severe emotional distress due to the recruitment of “gang stalkers” (sufferers in the search for validation from their peers who desire to replace their unnerving emotion of diffuse fear with a determined and righteous anger) for the purposes of attacking the Plaintiff on social media outlets. That the conduct of the Defendant C.E.O. was in reckless disregard to the probability that Plaintiff would suffer emotional distress, and that the Defendant C.E.O. intended to cause emotional; distress with his outrageous conduct which was a substantial factor in causing Plaintiff’s severe emotional distress.

88. The Defendant’s sole employee and C.E.O. knew accusations of criminal conduct and fraud upon the court would have a detrimental impact on the Plaintiff’s technical business career as a Certified Ethical Hacker, which would cause the Plaintiff to endure angst, anxiety, sleep disturbances and concern over future career opportunities.

FOURTH CAUSE OF ACTION

Common Law Tort of Trade Libel – Against Defendant M.S.D.I.

89. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 88, inclusive, as if fully restated herein.

90. Plaintiff claims that Defendant, acting as a “C.E.O.” in his personal and business capacities, harmed him by making a statement that disparaged Plaintiff’s cyber security and critical infrastructure protection skills. The Defendant, acting as a “C.E.O.” published statements in a widely disseminated manner across a dozen social media properties that

disparaged the ethics, skills, competence and quality of Plaintiff's cyber security and infrastructure protection services. These insinuations, disparagements and slurs were known to the "C.E.O." to be false, but the Defendant corporations arranged for publication to tens of thousands of viewers, nevertheless.

91. That Defendant companies, under the "C.E.O.'s" control, knew that these statements and insinuations were untrue; but, acted with reckless disregard of the truth or falsity of these statement, which called out the Plaintiff by his name and likeness, photograph and/or persona which would cause employers and customers in the cyber defense industry to recognize the Plaintiff.

92. That the Defendant's companies, under the control of the "C.E.O.", acting in his personal and business capacities, knew or should have recognized that someone else might act in reliance on the statement, causing Plaintiff financial loss; and that the Plaintiff suffered direct financial harm because someone else acted in reliance on the statements; and that Defendants' conduct was a substantial factor in causing Plaintiff's harm.

93. That such statements were made in video content that appeared on the services YouTube.com, SubscribeStar.com and PATREON.com and were creations of the C.E.O. Defendant acting in his personal and business capacities.

FIFTH CAUSE OF ACTION

False Advertising – Against Defendant

Violations of Lanham Act, 11 U.S.C. § 1125(a). Section 1125(a)

Against Defendants M.S.D.I., ODYSEE, LBRY

94. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 93, inclusive, as if fully restated herein.

95. That the Defendant “C.E.O.” is engaged in the deceptive and false advertising concerning video podcasts available under CrowdSource The Truth brand, which are nothing more than hoax journalism and are not to be considered – in any way – to be truthful. This commercial speech, advertising in disguise, is designed to lure the general public to the PATREON and/or the SUBSCRIBESTAR page via the use of false, deceptive and misleading advertising. These false misrepresentations are designed to deceive the public at larger in Michigan, as a reasonable consumer would assume that fact-checking and vetting is taking place as advertised. In the mind of a reasonable Michigan consumer CrowdSource The Truth is a fact checking truth engine that relies on the crowd to vet facts.

96. The “ABOUT US” definitions of CrowdSource The Truth that appears at <https://www.patreon.com/crowdsourcethetruth> are misleading, deceptive and designed to lure uninformed consumers; quoting in relevant part:

About Crowdsourc The Truth
Crowdsourc The Truth is an Open Source Fact Checking "Truth Engine" and political social media movement. We gather and disseminate raw intelligence and present it to our constantly expanding network of human brains for vetting, analysis and assessment. Crowdsourc the Truth focuses on examining current events, public policy, history, truth in media and other topics of interest. Members work together to collect and analyze data from around the web and around the world. Together, we will do our best to determine what is fact and what is fiction. Everyone is invited to participate but of course no one is required to. If you see something you disagree with, challenge it with stronger evidence and logic or simply tune it out. This group is an Autocratic Democracy, to borrow some Orwellian doublespeak from those I wish to examine. I run it, but of course if the group dislikes my decisions the project will fail. All decisions will be subjected to group consensus. If anyone doesn't like the direction, please suggest a change or feel free to bow out."

97. The foregoing statement is entirely false and designed to deceptively entice members of the consuming public in Michigan to provide credit card donations (as “patrons”) to the Defendant companies. There is no fact checking, issues are not vetted by the community, there is no examination of “evidence”, etc. The attestation is false and designed to mislead the consuming public. The “C.E.O.” acting with Defendant M.S.D.I. and acting in his personal and professional capacities acted knew such claims as to a “Truth Engine” were false.

98. Every CrowdSource The Truth video podcast placed on publicly available social media (YouTube, Twitter, FaceBook, Periscope, Bit-Chute, etc.) contains a solicitation to join the PATREON or SUBSCRIBESTAR fan page. These solicitations are widely disseminated worldwide and to consumers in Michigan. These social media footprints act as advertisement devices, or advertising in disguise. These “teaser” public podcasts entice, lure, and direct the consuming public to become “patrons” on the PATREON fan page. (<https://www.patreon.com/crowdsourcethetruth>)

99. The Plaintiff has suffered financial hardship as a result of the commercial trade libel and commercial disparagement via the use of the Defendant’s false advertising, which insinuates the Plaintiff is unfit to perform his professional duties as a Certified Ethical Hacker and is engaged in a criminal conspiracy with Richard Loury.

100. These advertisement messages, transported over the Interstate wires, are untrue or misleading, which is known to the Defendant, or which by the exercise of reasonable care would have been known, to be untrue or misleading, which were disseminated as part of a plan or scheme with the intent not to provide truthful representations, truthful stories, truthful “crowdsourcing”, etc. The Defendant proceeded in reckless disregard of the truth to publish false and misleading information to the consuming public in Michigan.

101. That the foregoing allegations violate the Lanham Act at 11 U.S.C. § 1125(a). Section 1125(a) which creates two distinct bases for liability: false association, and false advertising. The Plaintiff alleges the Defendant violated both Lanham Act provisions.

SIXTH CAUSE OF ACTION

Violations of the Federal Trade Commission Act, 15 U.S.C. § 45(a), which prohibits “unfair or deceptive acts or practices in or affecting commerce.”

Against Defendants M.S.D.I., ODYSEE, LBRY

102. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 101, inclusive, as if fully restated herein.

103. Defendant companies – M.S.D.I., ODYSEE, LBRY practices as described above constitute deceptive acts or practices in violation of Section 5 of the Federal Trade Commission (FTC) Act, 15 U.S.C. § 45(a). Michigan consumers have suffered, and will continue to suffer, substantial injury as a result of Defendant’s violations of the FTC Act. In addition, Defendant has been unjustly enriched as a result of his unlawful acts or practices. Absent injunctive relief by this Court, Defendant companies M.D.S.I., ODYSEE, LBRY will likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

104. Acts or practices are unfair under Section 5 of the FTC Act if they cause or are likely to cause substantial injury to consumers that consumers cannot reasonably avoid themselves and that is not outweighed by countervailing benefits to consumers or competition. 15 U.S.C. § 45(n). Defendant companies’ acts or practices in processing fraudulent and unauthorized transactions to consumers’ accounts with the intent to defraud, as described in foregoing paragraphs above, have caused or are likely to cause substantial injury to consumers that is not reasonably avoidable by consumers themselves and that is not outweighed by countervailing

benefits to consumers or competition. Such injury is the predictable result of the acts or practices described in the paragraphs above.

105. Therefore, Defendant's acts or practices, as described above, constitute unfair acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. §§ 45(a) and 45(n).

SEVENTH CAUSE OF ACTION

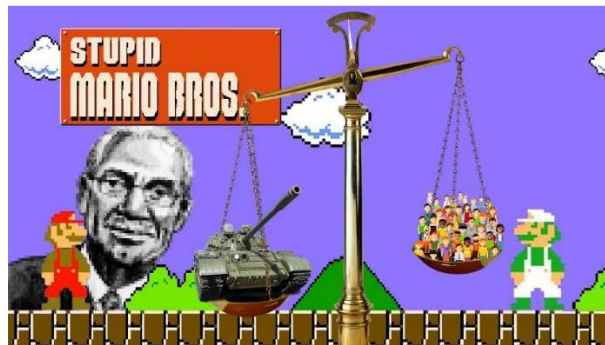
Defamation by Implication – Against Defendant M.S.D.I.

106. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 105, inclusive, as if fully restated herein.

107. That Defendant and its' C.E.O. made statements that are materially false concerning any cooperation on the part of the Plaintiff to assist, participate or collaborate in any scheme to docket forged documents in this Court.

108. Defendant M.S.D.I.'s use of "the Sweigert brothers" and the "Super Mario Brothers" in an opened and continuous podcast series indicates the portrayal that somehow the Plaintiff is cooperating with his estranged brother ("GEORGE WEBB"), which the Defendant C.E.O. knows is falls, and has proceeded in reckless disregard to the truth to state otherwise.

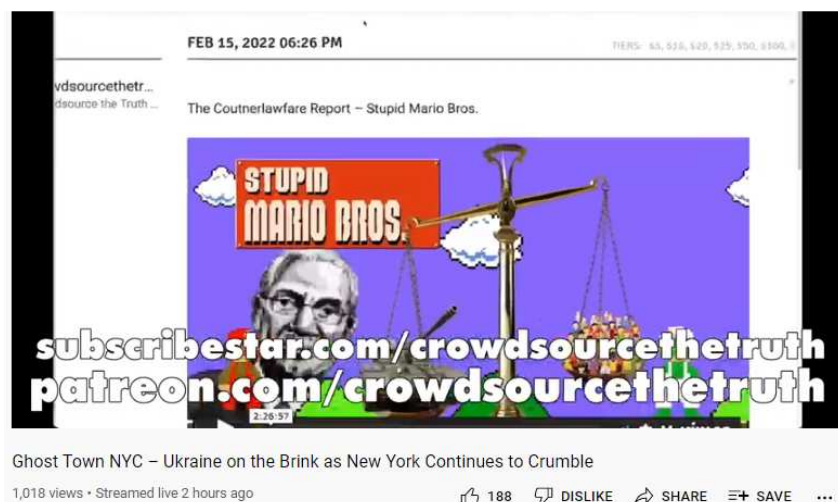
109. That Defendant places content on PATREON and SUBSCRIBESTAR under the banner of the COUNTER LAWFARE REPORT which implicates the "Super Mario Brothers" and Richard Louri in a criminal conspiracy. See below:





<https://twitter.com/csthetruth/status/1493779009854967808>

110. The above Twitter tweet from CrowdSource The Truth promotes the COUNTER LAWFARE REPORT on privatized channels, as does the YouTube video, shown below, which promotes the same program (featured cartoon of the presiding judge); entitled, *Ghost Town NYC – Ukraine on the Brink as New York Continues to Crumble*, published Feb. 21, 2022.



<https://www.youtube.com/watch?v=XXIW9QXb3r8>

111. This privatized program (see above) that is advertised on the public video *Ghost Town NYC – Ukraine on the Brink as New York Continues to Crumble* features content concerning the criminal conspiracy by the “Stupid Mario Brothers”. This implicates the Plaintiff in a confabulation with “GEORGE WEBB” concerning a crime, according to the Defendant, and implicates the Plaintiff in such a crime.

112. Mr. Goodman directs people to his COUNTER LAWFARE website, displaying *Goodman v. Bouzy* and “GEORGE WEBB” (SDNY), revealing the identity of a “Super Mario Brother”.



<https://www.youtube.com/watch?v=VQAFqyoliBA>

6 vs.
7
8 CHRISTOPHER ELLIS BOUZY, BOT SENTIEL, INC,
GEORGE WEBB SWEIGERT
9 Defendants
10
11 Pro Se Jason Goodman ("Goodman") alleg

Above: The name George Webb Sweigert is clearly displayed



113. Defendant M.S.D.I. published discrete facts in such a way that they create a substantially false and defamatory impression by omitting material facts or juxtaposing facts in a misleading way.

114. Defendant M.S.D.I. published these discrete facts by innuendo, and that Defendant intended or knew the implications that the public could draw from the allegedly defamatory material. These statements were made with a reckless disregard to the truth by the Defendant. The Defendant C.E.O. intended to convey a false impression that the Plaintiff had violated the Michigan Penal Code.

115. Defendant C.E.O. acted with negligence and actual malice to distribute these falsehoods. The Defendants implication's that the Plaintiff conspired with Richard Louri or "GEORGE WEBB" are materially false.

116. That Defendant made statements capable of interpretation by a reasonable listener as stating "actual facts" about the plaintiff, as opposed to statements of opinion.

EIGHTH CAUSE OF ACTION

Vicarious Liability Against Defendant M.S.D.I.

117. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 116, inclusive, as if fully restated herein.

118. In all of the tortious acts described in this complaint vicarious liability is imposed upon M.S.D.I. / 21C3D for the conduct of the "C.E.O.". There is a direct causal relationship between the tortious conduct of this "C.E.O." and the Plaintiff's injuries. This "C.E.O." acted on behalf of this "corporate" entities, M.S.D.I. / 21C3D. There was actual participation by the "C.E.O." in the tortuous conduct. The "C.E.O." participated in the wrongdoing and/or authorized such conduct and/or directed that such acts described above be done.

119. Although the "C.E.O." specifically knew or reasonably should have known that his tortious activity under his control could injure Plaintiff, he negligently failed to take or order

appropriate action to avoid the harm as part of his official duties with M.S.D.I. / 21C3D. An ordinarily prudent person, knowing what the “C.E.O.” knew at that time, would not have acted similarly under the circumstances.

NINTH CAUSE OF ACTION:

VIOLATIONS OF THE COPYRIGHT ACT AND THE DMCA

Against all Defendants ODYSEE, LBRY, M.S.D.I.

120. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 119, inclusive, as if fully restated herein.

121. ODYSEE failed to comply with the DMCA by failing to notify Defendant M.S.D.I. of content violation reports and without providing an opportunity for M.S.D.I. to file counter-claim reports.

122. ODYSEE and LBRY do not have the technical instrumentation of processes to remove or destroy infringed copyright and/or other illegal material from the blockchain cryptographic sequence, that is time stamped with a specific checksum. That removing infringing content can not be accomplished on a blockchain.

123. That ODYSEE led consumers to believe that it had the technical capability to remove infringing copyrighted content that contained H.I.P.A A. protected health information. That such representations were a ruse and misrepresentation.

DAMAGES

124. Plaintiff seeks damages and equitable relief on behalf of himself, which relief includes, but is not limited to, compensatory and punitive damages, an order enjoining Defendants (all of them) from the use of the Plaintiff’s likeness, name and/or persona in social media podcasts, as

well as Plaintiff's future reasonable attorneys' fees and expert fees, and any additional relief that this Court determines to be necessary or appropriate to provide complete relief to Plaintiff.

125. Defendant M.S.D.I.'s acts and conduct have caused damage to Plaintiff and Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's wrongful acts in an amount subject to proof at trial. Plaintiff suffered from fear and confusion, self-doubt, anger, disbelief, shock, gloom, isolation, bewilderment as a direct and in direct of the Defendants (all of them) actions.

126. Plaintiff seeks an order of this Court awarding damages, restitution, disgorgement, injunctive relief and all other relief allowed.

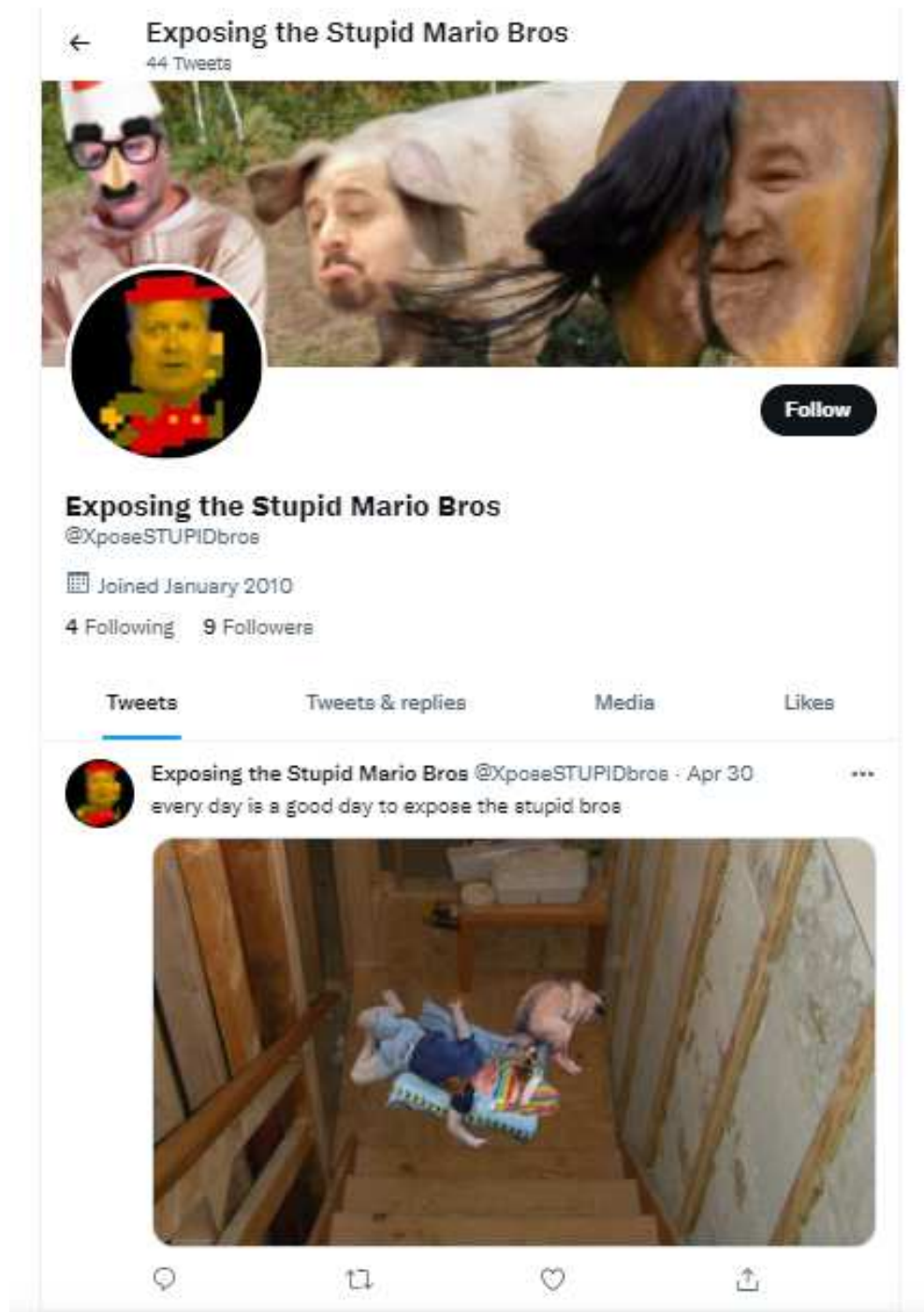
I hereby attest that the attached public documents are true and accurate artifacts under the penalties of perjury. Signed November 7, 2022.



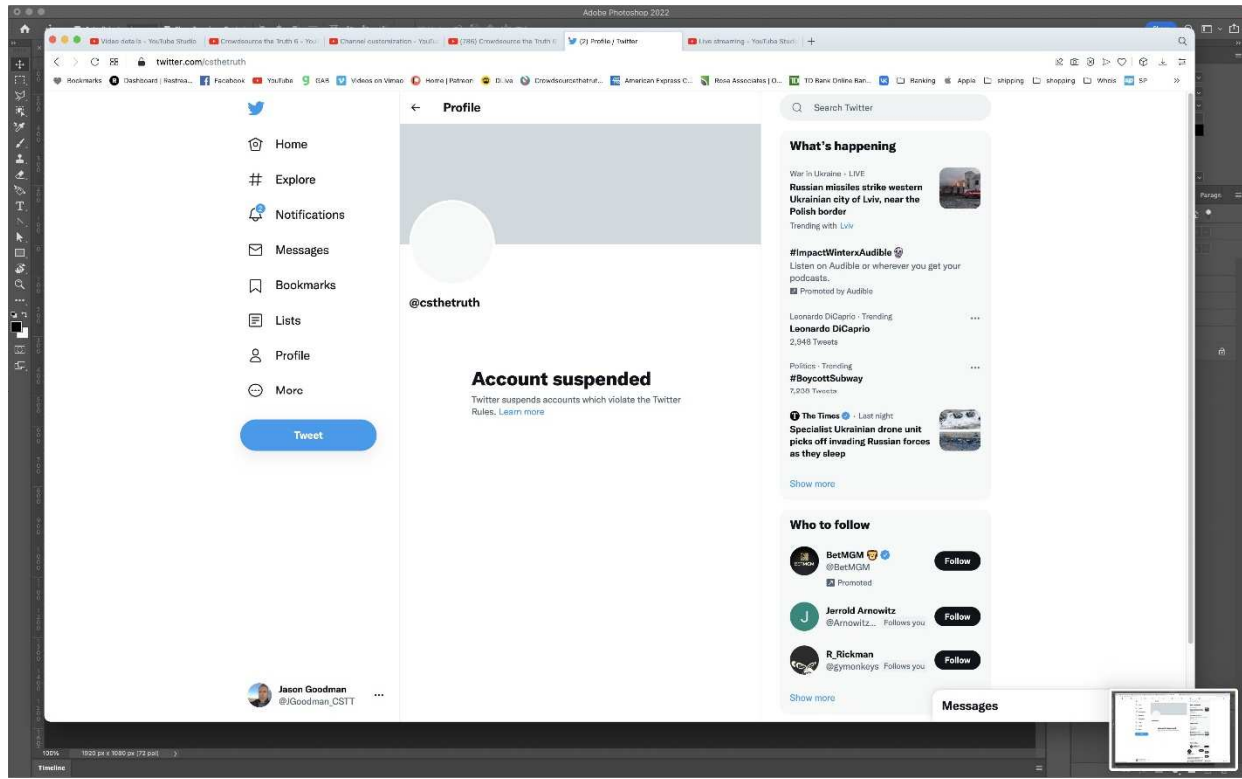
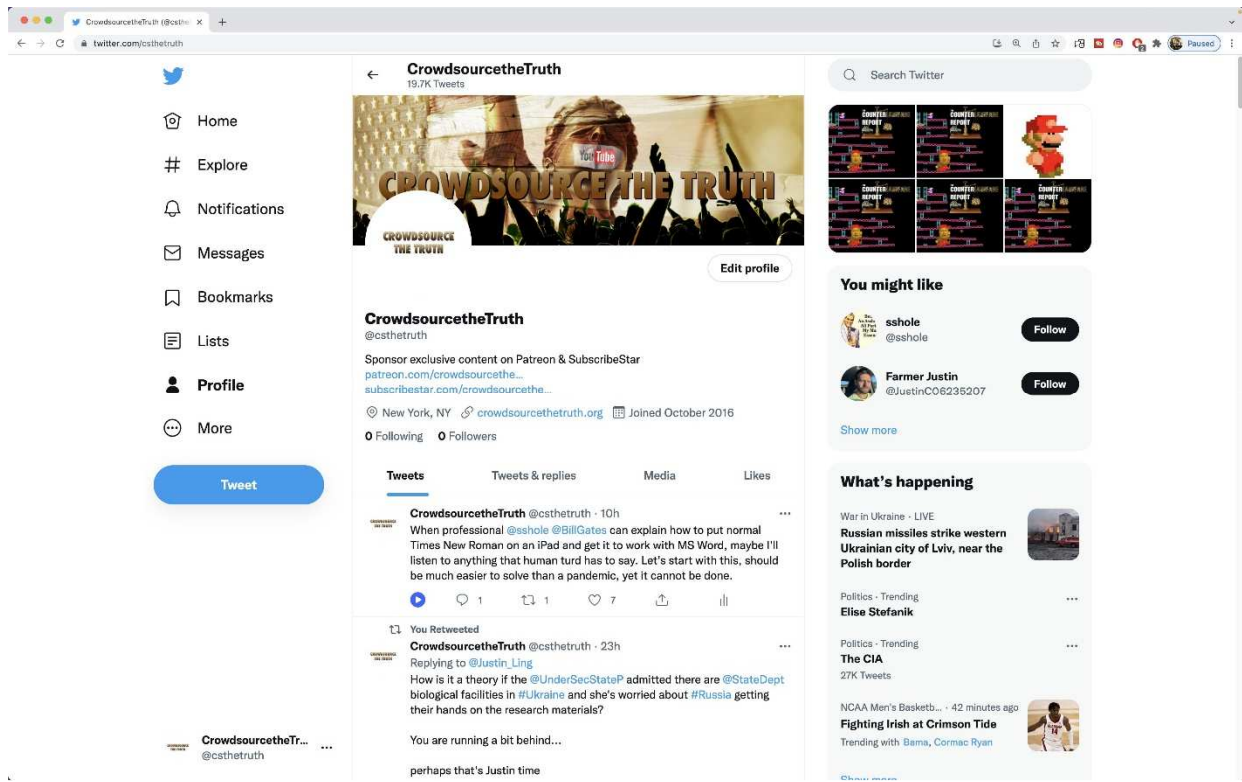
**D. G. SWEIGERT, C/O
AMERICA'S RV MAILBOX, PMB 13339
514 Americas Way, Box Elder, SD 57719**

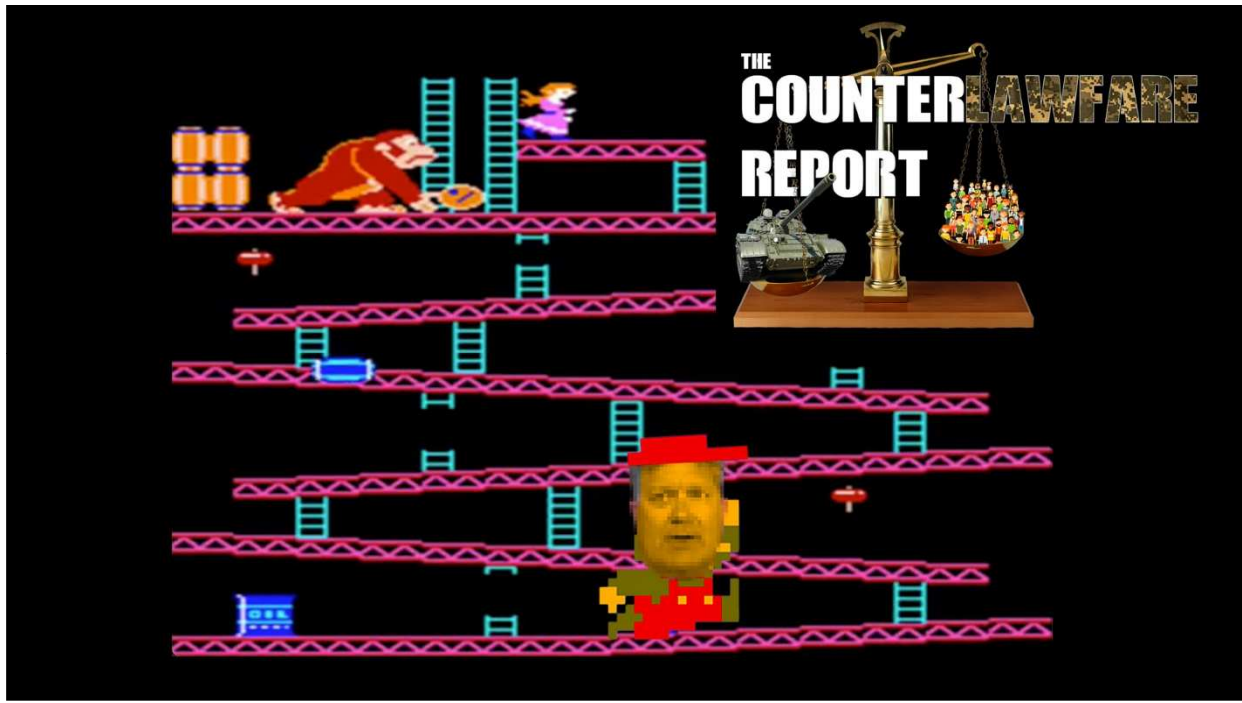
EXHIBIT ONE

https://twitter.com/XposeSTUPIDbros/with_replies









File 1: Uploaded as
"SweigertVCNNDrainSummons_PDF_
fillable2021.pdf", saved and attached
as "File_1_ProSe_20210617_16_11_
34_270.pdf"
Description: Summons Request

On Thu, Jun 17, 2021 at 4:07 PM [REDACTED]
[REDACTED] <[REDACTED]>
wrote:

Mr. Sweigert,

We have not received the document through
the Temporary Pro Se Document Upload
Program. We can not issue the Summons
until you correctly submit the document.

Best,

[REDACTED]

Pro Se Case Administrator

U.S. District Court - Eastern District of
Michigan

Direct Phone: [REDACTED]

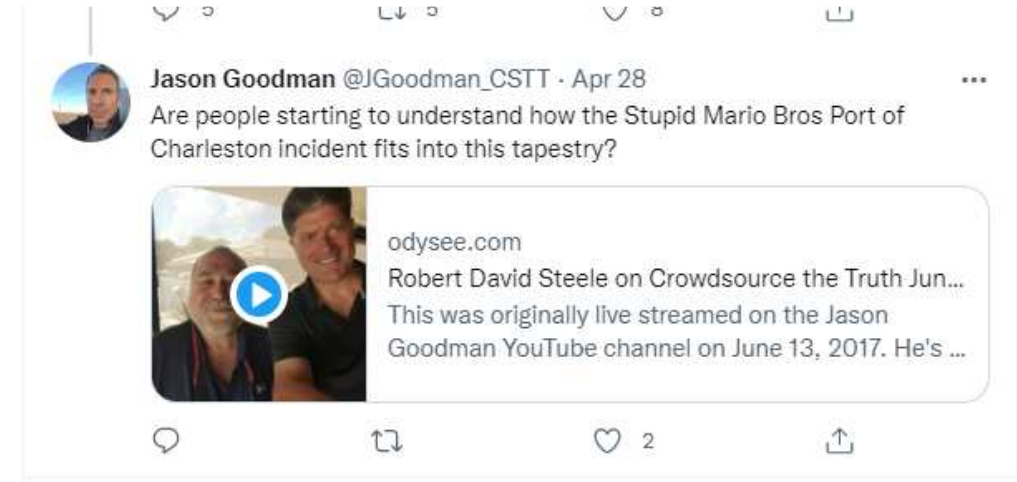
[\[REDACTED\]](#)

EXHIBIT TWO

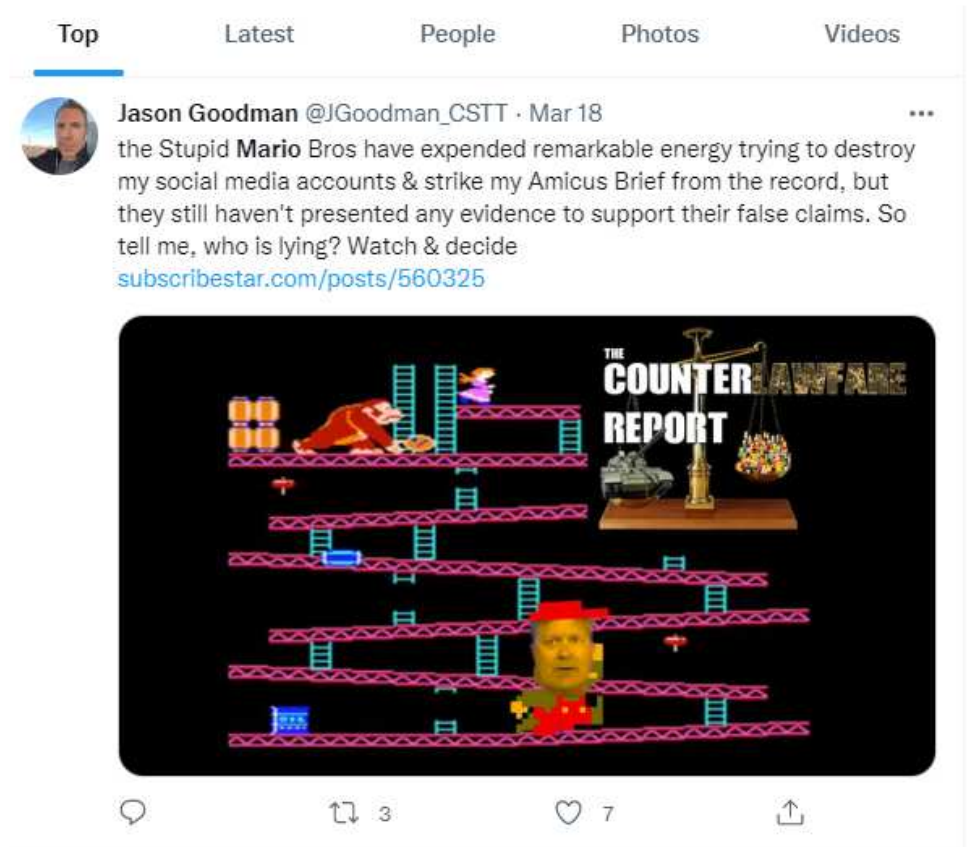
[https://twitter.com/JGoodman CSTT](https://twitter.com/JGoodman_CSTT)



https://twitter.com/JGoodman_CSTT/status/1519649224706637825



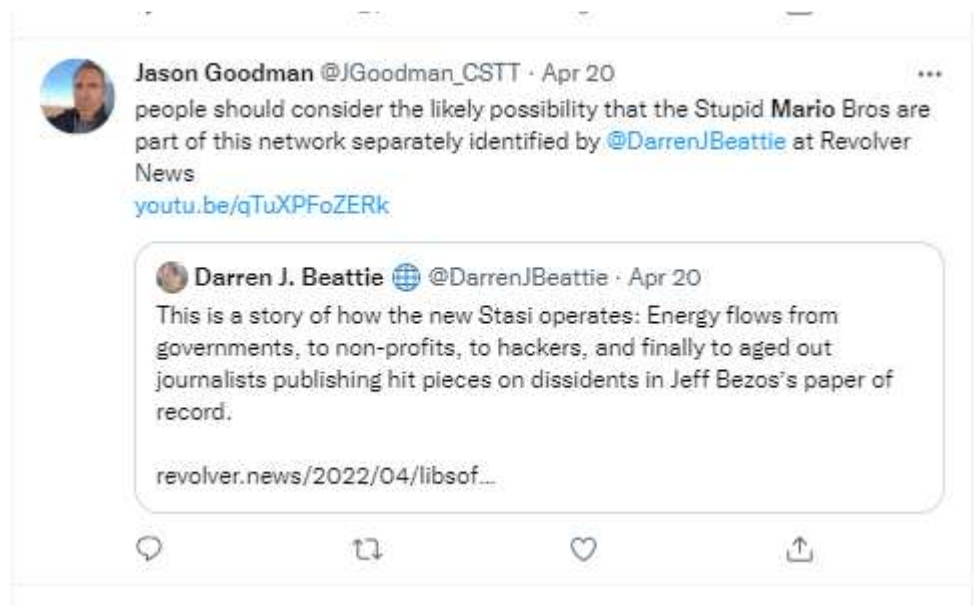
https://twitter.com/JGoodman_CSTT/status/1504954872273285126



https://twitter.com/JGoodman_CSTT/status/1516050190314221570



https://twitter.com/JGoodman_CSTT/status/1516797415902302214



https://twitter.com/JGoodman_CSTT/status/1519798730379169793



https://twitter.com/JGoodman_CSTT/status/1503831461341900806




<https://twitter.com/XposeSTUPIDbros/status/1509641726557839370>



 **Jason Goodman** 793 Tweets Follow

 **Jason Goodman** @JGoodman_CSTT · 2h
George Webb & his reprehensible brother are actively working to get @OdyseeTeam removed from the internet. These subversive operators are un-American enemies of free speech & should be jailed. Watch the Counterlawfare Report
subscribestar.com/crowdsourcethe...
patreon.com/crowdsourcethe...

You reported this Tweet. View

 1   1 

 **Jason Goodman** @JGoodman_CSTT · 2h
don't email me saying GW is a journalist, he's a dangerous liar & he's part of the effort to destroy the U.S. Constitution & America itself. He's said in his own words he would always protect @BarackObama #traitor lots of unflattering evidence on Odysee

 odysee.com
Getting the Big G out of the Big House v2 (originall...
As everyone now knows, intrepid investigator George Webb was arrested on June 15, 2017 under...


   1 

EXHIBIT THREE

<https://www.youtube.com/watch?v=qTuXPFoZERk>



[Crowdsourcethe Truth 5](#)

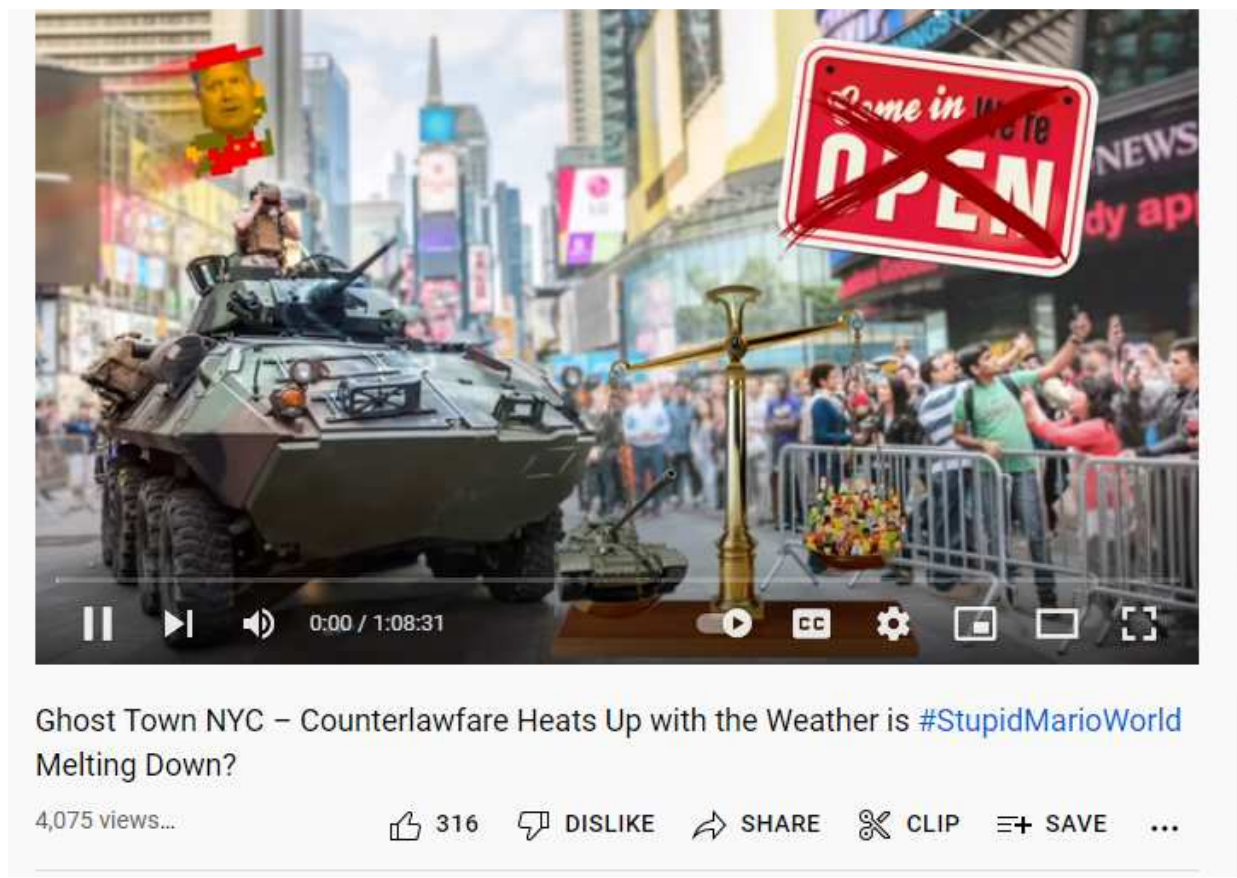
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10K subscribers

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[#NYC](#) [#Lawfare](#) [#StupidMarioBros](#) An amended Amicus Curiae Brief has dropped like a MOAB on the docket in Detroit sending shockwaves through Stupid Mario World.

The weather is warming up as some people face the real possibility of jail. subscribe to Crowdsourcethe Truth on Rumble - <https://rumble.com/user/csthetruth> subscribe to Crowdsourcethe Truth on Odysee - <https://odysee.com/@Crowdsourcethetruth...> Please sponsor the Crowdsourcethe Truth Counterlawfare Fund at <http://www.crowdsourcethetruth.com>. Become a sponsor & enjoy exclusive content on SubscribeStar & Patreon Get a FREE 3-Day trial at <http://www.subscribe.com/crowdsou...> <http://www.patreon.com/crowdsourcethe...>

EXHIBIT FOUR

<https://twitter.com/GHenryDickface>





<https://twitter.com/GHenryDickface/status/1519312008390270978>



GeorgeHenryDickface
@GHenryDickface

...

CIA Dave Acton court testimony



odysee.com

CIA Dave Acton court testimony George Webb part1of2

View CIA Dave Acton court testimony George Webb part1of2 on Odysee

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